

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Emoji Company GmbH

Plaintiff,

v.

The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identifiedon Schedule A Hereto

Defendants.

Case No.: 1: 23-cv-01112

Judge John F. Kness  
Magistrate Judge Young B. Kim

**DEFENDANT XIAMEN HAILUN TRADING CO., LTD.’S  
UNOPPOSED MOTION FOR EXTENSION OF TIME**

Defendant Xiamen Hailun Trading Co., Ltd. (“Defendant”), pursuant to FED. R. CIV. P. 6(b)(1), respectfully moves for an extension of time to respond to Plaintiff’s complaint on or before July 7, 2023. In support, Defendant states:

1. The undersigned firm has recently been retained to represent Defendant and entered its appearance in this matter.
2. Given the recency of retention, the undersigned has not yet had an opportunity to fully assess the merits of Defendant’s claims and defenses.<sup>1</sup>
3. Accordingly, the undersigned respectfully seeks an extension of time for Defendant to respond to Plaintiff’s complaint on or before July 7, 2023.
4. On June 2, 2023, the undersigned conferred with Plaintiff’s counsel regarding the relief sought herein, to which counsel does not object.

---

<sup>1</sup> In filing this Motion, Defendant reserves its rights to challenge this Court’s personal jurisdiction over Defendant, including Plaintiff’s purported service of process over Defendant.

5. Therefore, Defendant respectfully requests that this Court enter an order that extend the deadline for Defendant to respond to Plaintiff's complaint on or before July 7, 2023.

Date: June 5, 2023,

Respectfully submitted,

By: /s/ Zhen Pan  
One of Its Attorneys

Zhen Pan  
Email: zpan@diazreus.com  
DIAZ, REUS & TARG, LLP  
100 Southeast Second Street  
3400 Miami Tower  
Miami, Florida 33131

*Counsel for Defendant Xiamen Hailun  
Trading Co., Ltd.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 5, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and served it on all counsel of record.

By: /s/ Zhen Pan  
Zhen Pan